

# Request of Defendant For Production By State

STATE OF ALABAMA

V.

LARRY EARL JONES

DEFENDANT

CC-2003-418-419-187

CASE NUMBER

STATE OF ALABAMA

IN THE CIRCUIT

COURT OF COVINGTON  
COUNTY.

DEFENDANT, LARRY EARL JONES, PRO SE, HEREBY REQUESTS THE  
STATE OF ALABAMA;

1. TO PRODUCE AND PERMIT THE DEFENDANT TO INSPECT AND COPY  
ANY WRITTEN OR RECORDED STATEMENTS MADE BY THE DEFENDANT  
ANY LAW ENFORCEMENT OFFICER, OFFICIAL OR EMPLOYEE WHICH  
ARE WITHIN THE POSSESSION, CUSTODY, OR CONTROL OF THE  
STATE OF ALABAMA, THE EXISTENCE OF WHICH IS KNOWN  
TO THE DISTRICT ATTORNEY.

2. TO PRODUCE AND PERMIT THE DEFENDANT TO INSPECT AND COPY  
ANY WRITTEN OR RECORDED STATEMENT MADE BY A CO-  
DEFENDANT OR ACCOMPLICE, WHICH IS IN THE POSSESSION,  
CUSTODY OR CONTROL OF THE STATE, THE EXISTENCE OF  
WHICH IS KNOWN TO THE DISTRICT ATTORNEY AND  
WHICH THE STATE INTENDS TO OFFER INTO EVIDENCE  
AT TRIAL.

EXHIBIT  
G

To disclose to the defendant the substance of any oral statement made by the defendant before or after arrest to any law enforcement officer, official or employee which the state intends to offer into evidence at trial.

To disclose to the defendant the substance of any oral statements made by a co-defendant or accomplice, before or after arrest to a law enforcement officer, official or employee, which the state intends to offer into evidence at trial.

To produce and to permit the defendant to analyze, inspect, and copy or photograph each of the following which are within the possession, custody or control of the state and which are material to the defendant's defense;

(To list the books, papers, documents, photographs, objects, controlled substances, etc. and describe each of them)

To produce and permit the defendant to analyze, inspect and copy or photograph each of the following which are within the possession, custody or control of the state and which are intended for use by the state as evidence at trial;

EXHIBIT  
G

HERE LIST THE BOOKS, PAPERS, DOCUMENTS, PHOTOGRAPHS, OBJECTS, CONTROLLED SUBSTANCES, ETC. AND DESCRIBE EACH OF THEM]

TO PRODUCE AND PERMIT THE DEFENDANT TO ANALYZE, INSPECT AND COPY OR PHOTOGRAPH EACH OF THE FOLLOWING WHICH ARE WITHIN THE POSSESSION, CUSTODY OR CONTROL OF THE STATE AND WHICH WERE OBTAINED FROM OR BELONG TO THE DEFENDANT:

HERE LIST THE BOOKS, PAPERS, DOCUMENTS, PHOTOGRAPHS, OBJECTS, CONTROLLED SUBSTANCES, ETC. AND DESCRIBE EACH OF THEM]

TO PRODUCE AND PERMIT THE DEFENDANT TO INSPECT AND COPY THE NAMES AND ADDRESSES OF QUALIFIED MENTAL HEALTH PROFESSIONALS WHO HAVE PERSONALLY EXAMINED THE DEFENDANT OR ANY EVIDENCE IN THIS CASE.

TO PRODUCE AND PERMIT THE DEFENDANT TO INSPECT AND COPY THE FOLLOWING RESULTS OR REPORTS MADE IN CONNECTION WITH THIS CASES, WHICH ARE WITHIN THE POSSESSION, CUSTODY OR CONTROL OF THE STATE, AND WHOSE EXISTENCE IS KNOWN TO THE DISTRICT ATTORNEY:

EXHIBIT  
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ERE DESCRIBE THE PHYSICAL OR MENTAL EXAMINATIONS AND  
IENTIFIC TESTS, EXPERIMENTS OR COMPARISONS, INCLUDING  
WRITTEN REPORTS OR STATEMENTS MADE BY AN APPOINTED  
ENTAL HEALTH PROFESSIONAL IN CONNECTION WITH THESE  
SES]

TO PERMIT THE DEFENDANT TO ENTER, FOR JUDGMENT  
ACQUITTAL AND THE LESSER INCLUDED OFFENSE(S), OF  
LAWFUL POSSESSION OF DRUG PARAPHERNALIA, A CLASS  
MISDEMEANORS, COURT COST, AND FINES, TIME  
EVERED, THE FACTS IS DEFENDANT REQUEST TO ANALYZE AND  
PHOTOGRAPHS OF THE CONTROLLED SUBSTANCES.  
NSPECTION OF THESE PREMISES AND OBJECTS IS REQUESTED  
ECAUSE THEY ARE MATERIAL TO THE PREPARATION OF THE  
FENDANT'S DEFENSE OR ARE INTENDED FOR USE BY THE STATE  
EVIDENCE AT TRIAL.

9-10-04  
DATE

Sargie Earl Jones  
DEFENDANT, PRO, SEI.

## CERTIFICATE OF SERVICE

CERTIFY THAT I SERVED A COPY OF THE FOREGOING REQUEST OF  
ENDANT FOR PRODUCTION BY STATE, ON THE DISTRICT  
HARNEY BY MAILING/DELIVERING A COPY OF SAME TO  
IN THIS DATE, 9-10-04, Sargie Earl Jones